

GetReal - Project No. 115546

**WP1: Deliverable D1.6 Early use of pragmatic designs in medicine
development**

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2 1. Executive Summary

3

4 This document describes the outcomes of stakeholder engagement undertaken by Work
5 Package 1 of GetReal which had the aim of eliciting a comprehensive stakeholder view on
6 the acceptability and usefulness of pragmatic clinical trials for establishing relative
7 effectiveness of new drugs. Stakeholder opinions are based on discussions during a
8 workshop that was held on 9 September 2015.

9 *Workshop overview*

10 This workshop combined presentations, group breakout sessions and plenary
11 discussions with the aim of exploring the key challenges of incorporating early pragmatic
12 trials into medicines development frameworks.

13

14 *Workshop objective*

15 To understand stakeholder views regarding pragmatic clinical trials, conducted prior to
16 market authorisation, as sources of data on relative effectiveness that can be used in
17 regulatory and/or reimbursement decision-making: study timing and design, the strength
18 of evidence on effectiveness, acceptability for decision making and the generalisability of
19 results.

20

21 *Overall message/conclusions*

22 The use of pragmatic clinical trials in medicine development is still very much in its infancy
23 and most of the proposals put forward in this workshop are theoretical because practical
24 experience from the perspective of all stakeholders in this field is very limited. Conclusions
25 on the acceptability of pragmatic approaches in medicine development will develop with
26 time as decision makers are given opportunities to gauge the acceptability of pragmatic
27 elements of trial design in routine practice. In the meantime, initiatives which set out to
28 understand the factors that contribute to the efficacy-effectiveness gap will be of
29 increasing importance in order to identify where pragmatic study elements may have the
30 greatest impact (for instance by further literature reviews of regulatory and health
31 technology assessment (HTA) challenges, as undertaken in this case study). It is expected
32 that this type of due diligence will identify elements on the pragmatic continuum that can
33 be implemented early in a clinical development programmes to meet specific effectiveness
34 challenges. Different challenges may require different levels of pragmatism and review of
35 whole development programmes, rather than individual studies, will allow pharmaceutical
36 R&D to consider what activities can be stopped or reduced if additional pragmatic clinical
37 trials (PCTs) are planned. It will also allow consideration of the most efficient ways of

38 addressing effectiveness challenges within the programme, either by increasing
39 pragmatism of traditional randomised controlled trials (RCTs) or including new PCTs.

40

41 Questions still remain regarding the situations in which pragmatic elements could add the
42 most value to the clinical development process and when is the best time to incorporate
43 them. Best practice guidelines on the use of early pragmatic designs/elements will help to
44 allay these uncertainties in the design of future PCTs. Collaborative efforts such as case
45 studies and evidence synthesis from disparate sources will also provide insight in this
46 respect. Moreover, a greater use of the joint regulatory/HTA scientific advice process will
47 help determine how pragmatic elements can be brought into traditional RCT in order to
48 improve estimates of effectiveness and reduce uncertainty in decision making by
49 stakeholders. It should also be borne in mind that the most conservative and most widely
50 implemented RCT designs may not always be the most appropriate.

51

52

53

54 **2. Stakeholder views on the usefulness and acceptability of pragmatic clinical** 55 **trials**

56

57 Stakeholder opinions are based on discussions during a workshop that was held on 9 September
58 2015. In order to encourage openness and sharing of information, the workshop was held under
59 Chatham House rules which means that neither the identity nor the affiliation of the speakers, nor
60 that of any other participant, is revealed. During two separate group breakout sessions, participants
61 explored how early PCTs could address effectiveness challenges. The participants debated various
62 aspects of PCTs and explored the acceptability and value of early PCTs to a range of stakeholders
63 (payers, regulatory, patients, pharmaceutical R&D).

64 **Breakout session 1:**

65 Participants were divided into three groups to discuss the following two questions:

66 ***Question 1: Which effectiveness questions would pragmatic designs best*** 67 ***address?***

68 *OBJECTIVE: Identify which effectiveness questions would be regarded by stakeholders as particularly*
69 *suited to be addressed by early PCTs*

70

71

72 **Overall summary:**

73 The majority of views indicated that PCTs had a clear role in situations when RCTs can't answer the
74 question of effectiveness; in particular when **efficacy is not predicted to match effectiveness**, for
75 reasons such as patient characteristics, comorbidities, real-world patient behaviour (for instance.
76 adherence), expected differences between old and new drug profiles, or the way health systems
77 provide their service. However there is clear need to understand when efficacy and effectiveness are
78 going to be different to inform decisions on whether or not to implement PCTs.

79 It was suggested that PCTs could **allow enrolment of a greater number of patients** than traditional
80 RCTs and therefore would allow expansions of populations of interest. Pragmatic designs were also
81 viewed as beneficial for establishing **effectiveness in subgroups of the general population**,
82 especially those which may otherwise be excluded from conventional RCTs due to more stringent
83 inclusion/exclusion criteria. Moreover, there was a preference for the ***a priori* identification of**
84 **subgroups** on which the study could be designed, rather than *post hoc* subgroup derivation and
85 evaluation. However, it was pointed out that subgroup analyses in PCTs could be difficult to conduct,
86 for instance in situations where there is variety of usual care.

87

88 PCTs could generate valuable evidence on **acceptability by patients** in real practice and for
89 **confirming positioning** of new treatment in treatment paradigms.

90 There was a general consensus among stakeholders that a particular benefit of pragmatic designs is
 91 the ability to capture effectiveness of drugs when **comparators are used in a manner in the real**
 92 **world that can't be replicated in RCTs**, for instance when a medicine is used off label. Moreover,
 93 PCTs could be beneficial in situations where **wide variability in usual** care makes it hard to define a
 94 single comparator arm, or when there is interest in comparing to a treatment guideline or strategy.

95 PCTs were generally thought of as **long-term trials** especially since they can be **more adaptive**,
 96 incorporating advances in clinical practice, the arrival of additional comparators, and accumulation
 97 of knowledge of the disease.

98

99 **Group 1**

100 Stakeholders in this group included representatives from the pharmaceutical R&D, health
 101 technology assessors and academia. Participants provided a range of views on when PCTs would be
 102 useful and conversely when they would not be expected to be useful.

103 Stakeholders indicated that the key value for PCTs was in disease areas or clinical settings where
 104 efficacy and effectiveness are thought to be very different. It is therefore important to be able to
 105 predict where this is the case early in the drug development. Particular value was seen for PCTs in
 106 diseases where there are multiple treatment options and a variety of clinical practice, which could
 107 not be assessed in a traditional RCT.

108 Perspectives of individual comments are noted after each comment: Pharma R&D (Pharma), health
 109 technology assessors (HTA), Analytical/Academic (Acad).

PCT useful	PCT (less or) not useful
If efficacy and effectiveness are thought/expected to be very different (Pharma/Acad)	If efficacy and effectiveness are thought to be very related
Multiple active comparators & other therapeutic options & a variety of clinical practice (Pharma/HTA)	In head-to-head comparisons. For example to compare treatment A to treatment B.
For combinations of treatments (Pharma)	Where indirect comparison can substitute PCT data (Pharma)
For incorporating endpoints that are not possible in RCT (Pharma)	In situations where there is limited scope for flexibility in practice or when patient population are not going to be diverse/broad (HTA)
In special populations (elderly, comorbidities) (Pharma)	If infrastructure to embed PCT in clinical practice is lacking (HTA)
In a more general population (but also with the aim of identifying which subgroup(s) has the greatest benefits) (Pharma/Acad)	If interpretation is difficulty due to heterogeneity: underpowered subgroups, need extreme numbers or follow-up trials in subsamples later (Pharma/Acad)
For incorporating/accommodating changing landscape and evolving understanding of disease and treatment effects. Compared with the more static protocol of RCTs (Pharma)	For vaccinations (Acad)

To unearth issues/knowledge of clinical practice earlier on (Pharma)	In situations where outcomes which require special testing or for procedures (Pharma)
For orphan indications (to increase the number of subjects) (Pharma)	When measurement of outcomes requires specific expertise.
If patients are very different in real life than in RCT, for instance with respect to adherence, long term treatment (Acad)	
For additional information on safety, as supplementary study (Acad/Pharma)	
To establish the level of influence of intervention on resource use – for cost-effectiveness analysis in HTA submissions (Acad/Pharma)	
Watch clinical practice	
Medical significance	
Long term data	
Study drop-out in induction phase (side-effect)	
To capture off-label use post-launch (Pharma)	
For utilising EHR and to actually observe what GPs are doing, observe actual dosing and corresponding treatment effect and adverse events (Pharma)	

110 * Stakeholder perspectives: Pharma R&D (Pharma), Health technology assessors (HTA),
 111 Analytical/Academic (Acad)

112

113 **Group 2**

114 Stakeholders in this group included patient representatives and representatives from the
 115 pharmaceutical R&D, regulatory (both pharma and public sector), and health technology assessors.
 116 In addition to the themes mentioned by group 1, the stakeholders indicated that PCTs could be
 117 useful for collecting more clinically relevant outcomes and provided opportunities for collecting
 118 more long-term outcomes than traditional RCTs would. The potential to better engage patients and
 119 other healthcare stakeholders was also emphasized.

120 When PCT is useful:

- 121 ○ Population
 - 122 ■ For targeted populations/subgroups (Reg)
 - 123 ■ Can include broader population than RCTs, more relaxed exclusion criteria
- 124 ○ Outcomes
 - 125 ■ Potential to collect more clinically relevant outcomes (Reg/HTA)
 - 126 ■ Patient reported outcomes (PROs). More real life PROs in PCTs could be aligned
 127 with guidelines (Pat)
- 128 ○ Assessing interventions embedded in a real-world setting
 - 129 ■ Some concern however on over-reliance on “real world” and “soft” PROs, which
 130 might give soft and messy data. Strictly guideline-driven trial could be an

- 131 alternative to embedding in imperfect (non guideline-compliant) clinical practice
132 since patients often might prefer clearer disease management (Pat)
133 ○ Opportunities for broader stakeholder engagement than RCTs (Patient, Pharma R&D)
134 ○ Incorporates a long-term perspective (All)
135 ▪ Often at least 1 year, possibly longer (Reg)
136 ▪ However, concerns that randomisation breaks down if patients move between
137 treatments (Pharma)
138 ▪ Also concerns about delayed approval (Pharma, Pat)
139 ○ Opportunities for assessing compliance to treatment

140

141 * Stakeholder: Pharma R&D (Pharma), Health technology assessor (HTA), Patients (Pat), Regulatory
142 (Reg)

143

144 **Group 3**

145 Stakeholders in this group included a patient representative and representatives from the
146 pharmaceutical R&D, academics, physicians, and payers. The group indicated that PCTs would be
147 useful for understanding real world acceptability of medicines and devices to patients but payers
148 may only be interested if this translates into effects on outcomes. There was agreement that
149 recruiting a broader patient population to provide an estimate of relative efficacy would be of value
150 to all stakeholders, although there was divergence over how to analyse the data. Furthermore, PCTs
151 could also capture earlier safety data in broader populations.

152 The group indicated these particular points on usefulness of PCTs:

- 153 ○ Population
154 ▪ There was agreement that including broader populations, (for example patients
155 with co-morbidities and non-compliant patients) was useful but some
156 stakeholders wanted to see the overall treatment effect in the total population
157 whilst others (particularly patient representatives) wanted to understand the
158 treatment effect in subgroups
159 ▪ Generalisability matters to everyone, patients, payers, industry
160 ○ Outcomes
161 ▪ For patients, endpoints about device use (ease of use and acceptability) and
162 compliance are very important and it is not possible to fully address this in RCTs.
163 However, payers needed to see the effect on outcomes
164 ▪ For collecting more representative health-related quality of life (HRQoL) and
165 more patient functional (vs. biological) endpoints which cannot be addressed in
166 conventional RCTs.
167 ○ PCTs could be useful when trying to demonstrate how a medicine could provide a
168 paradigm shift in treatment strategy by comparing to real world treatment strategies
169 ○ Safety
170 ▪ To supplement or even replace Phase 4 studies
171 ▪ Earlier safety data in broader populations

172

173

174 **Question 2: How strongly would results from pragmatic designs be accepted**
175 **as evidence?**

176 *OBJECTIVE: Identify the factors that influence whether pragmatic trial data would be considered as*
177 *“strong” or “weak” evidence and affect how it would be taken into account by decision makers.*

178

179 **Summary:**

180 Strengths generally relate to **external validity** inherent in PCTs and weaknesses reflect lack of
181 **internal validity** and difficulties with analyses (for example in subgroup analyses and dealing with
182 treatment changes and multiple comparators).

183 It was stated that **clear objectives must be agreed** and prioritised by relevant stakeholders and
184 included in a Reporting and Analysis Plan before study execution, to allow for studies to be **properly**
185 **powered** for subgroup analyses.

186 For decision makers, evidence from PCTs would be **more acceptable for drugs with a known**
187 **benefit/risk profile**, and **less acceptable for drugs with a novel mechanism of action** because of
188 uncertainties surrounding efficacy and safety profile of these drugs.

189 PCTs were seen as complementing RCTs; for instance they could be used to **justify clinical relevance**
190 of new drugs to decision makers. PCTs should however not replace RCTs, because decision makers
191 would still require **demonstration that treatment effects are consistent** with those observed in
192 standard RCTs. As such, it was mentioned that a carefully formulated clinical development plan that
193 plays on the strengths of RCTs and PCTs (i.e. the high internal validity of the former and the high
194 external validity of the latter) would provide for the most efficient use of resources and timely drug
195 delivery to patients. For example, the **inclusion of a broader patient population and more clinically**
196 **relevant endpoints in a typical phase 3 RCT could be more timely and efficient than introducing a**
197 **more real-world approach** with limited monitoring or other pragmatic elements in the development
198 plan. Therefore, the development plan should address when it is beneficial, based on broad
199 stakeholder perspectives, to incorporate a traditional RCT into development or when more elements
200 of the pragmatic continuum (possibly gauged by PRECIS criteria) should be introduced.

201 Randomisation could break down following treatment switching and in long term studies and
202 therefore the **robustness of long-term PCTs** was questioned.

203 Uncertainty regarding the most **appropriate trial design** and the most **appropriate evidence**
204 **synthesis** could lead to difficulties in interpreting the results and therefore lessen acceptability by
205 decision makers.

206

207

208 **Group 1**

209 The stakeholders noted that strengths and value of PCTs generally relate to external validity inherent
210 in PCTs and weaknesses reflect lack of internal validity and difficulties with analyses (for instance
211 subgroup analyses, dealing with treatment changes and additional comparators).

212 Rather than identifying the factors that influence whether PCT data could be considered strong or
213 weak, the group focused on the specific circumstances when the PCTs would be of greatest benefit,
214 and conversely when they would not be expected to be useful.

215 In which specific circumstances would PCTs be most beneficial?

216 - Before initial HTA assessment to provide an indication of clinical benefit in the general
217 patient population (HTA)

218 - For drugs with a known benefit/risk profile – known molecules/5th in class – possible pre-
219 launch (Pharma)

220 In which specific circumstances would PCTs not be beneficial?

221 - For new compound/new class – pre-launch very difficult (Pharma)

222

223 **Group 2**

224 PCTs were considered to be useful for understanding place in treatment paradigm and acceptability
225 for patients and HTA. Oral insulin was mentioned as one example, where the drug was discontinued
226 after launch because patients were finally not keen to use it. Perhaps a PCT at phase 3 would have
227 identified this problem earlier.

228 Comments on the acceptability of PCTs:

229 ○ Interpretation of data arising from PCTs compared with RCT (HTA)

230 ■ PCTs not blinded, potential lower effect, therefore uncertainty in overall effect
231 estimates

232 ○ Added benefit; PCT supportive to justify clinical relevance but RCTs remain core (Reg)

233 ○ Place in treatment paradigm (Pat, HTA)

234 ○ Use of drugs, compliance (Pat)

235 ■ inhaler technique for respiratory disease (HTA)

236 ■ route of administration (Pharma)

237 ○ Outcomes (Pat)

238 ■ Patients prefer outcomes that are clinical relevant. They should also be more
239 objective; it is possible for patients to state they are fine all the time regardless
240 of clinical reality

241 ○ Randomisation may break down in long term studies and therefore the robustness of
242 long-term PCTs could be questioned by decision makers (Pharma, Reg)

243 * Stakeholder: Pharma R&D (Pharma), Health technology assessor (HTA), Patients (Pat), Regulatory
244 (Reg)

245

246 **Group 3**

247 HTA stakeholders indicated that PCTs should be considered within the context of the development
248 plan for a medicine. Both RCTs and PCTs would be taken into account, assuming randomisation and
249 a comparative approach in the PCTs. If and RCT and PCT both examined the same objectives the
250 group would expect consistency in direction and if size of effect differed, payers might want to
251 understand why if that was not the case.

252 The group noted that PCTs could be affected by open label bias and this could lessen acceptability of
253 data. Consideration of biases should be incorporated into the design at an early stage. Observer bias
254 can be reduced through choice of endpoint.

255 Consensus was reached among all stakeholders in this group that clear objectives must be agreed
256 and prioritised by relevant stakeholders and included in a Reporting and Analysis Plan before study
257 execution allowing for the study to be properly powered for subgroup analyses.

258 It was noted that the choice of comparator is critical for decision-making and the payer may set the
259 relevant comparator(s) for their healthcare system. Although indirect comparisons can be
260 conducted, in some instances these may not meet the methods requirements of payers and thus
261 additional PCTs or RCTs may need to be incorporated in the development programme to address this
262 effectiveness challenge. If multiple comparators (for instance a physician choice standard of care
263 arm) are included in a PCT it is necessary to ensure that analyses for the relevant comparator
264 subgroup are powered as statistical significance on key endpoints is likely to be required by payers.

265

266 ***Breakout session 2***

267 Following the presentations, participants joined their previous groups and discussed the third
268 question:

269 ***Question 3: How can we maximise the value and acceptability of PCTs?***

270 *OBJECTIVE: How do we build on positive opportunities to utilise PCTs and address any barriers to*
271 *acceptability? Generate solutions to mitigate concerns around using PCT data in decision making. For*
272 *example: Scientific Standards and Best Practice; Scientific Advice and Review; Generalisability and*
273 *Analysis Plans; Raising understanding of RWE and Patient-Centred Outcomes Research.*

274

275

276 **Summary:**

277 **Push from both regulators and HTA regarding whether the development programme answers the**
278 **efficacy and effectiveness questions appropriately.** There needs to be dialogue on how they fit into
279 the evidence package as it may be unrealistic to ask for PCTs on top of requirements for RCTs.

280 **Guidelines on trial designs, evidence synthesis and best practice** should be developed, driven by
281 input from academia, rather than pharmaceutical R&D. Initially they should be focused on
282 overarching principles, rather than specific details. Multi-stakeholder case studies evaluating
283 whether different degrees/elements of pragmatic design would be effective in reducing decision
284 making uncertainty in different development scenarios were viewed as important to developing
285 additional knowledge.

286 A **stepwise approach** was suggested in implementation of PCTs, starting by looking at RCTs and
287 relaxing exclusion criteria and considering which aspects of the trial need to be more pragmatic.

288 **Upskilling on methodology and evidence synthesis** is needed in both pharma and public sectors.
289 Simulations may be used to increase generalisability but will not be acceptable by all payers. Thus,
290 there is a need for sufficient real-world data sources to inform simulations.

291 A framework is needed to **determine where efficacy/effectiveness gap is expected.** This determines
292 where you need more pragmatism in trials.

293 **Patients** have a clear role in providing the “**authentic voice**” that is needed to make PCTs more
294 accepted.

295 Exploration of **innovative trial designs**. For instance a hybrid PCT with an “RCT population” which
296 could provide internal validity of the trial.

297 Document and characterise **options for limited PCT** that is only pragmatic to a certain extent.
298 Pharma R&D and decision makers should **consider which pragmatic elements should be**
299 **incorporated** in the PCT.

300

301

302 **Group 1**

303 Participants indicated that there needs to be requirement from both HTA and regulatory sides for
304 PCTs to be included in evidence packages. Possible compromise needed on RCT requirements
305 because seems unrealistic to ask PCT on top of total RCT package.

306 A stepwise approach was suggested in implementation of PCTs, starting by looking at RCTs and
307 relaxing exclusion criteria and considering which aspects of the trial need to be more pragmatic. This
308 was seen as a more acceptable option compared with implementation of pure PCTs in the short to
309 medium term. One way of gauging how pragmatic an RCT is to ask sponsors to outline how
310 pragmatic their RCT is, perhaps by using PRECIS or similar tools.

311 An implementation of early PCT may lessen requirement for post authorisation studies. This should
312 be considered by pharma when assessing the value proposition of trials

313 Specific comments by stakeholder groups (“V” denotes comment on value and “A” on acceptance):

314 Pharma participants:

- 315 - A: Guidelines and good practice for PCTs needed
 - 316 ○ preferably HTA guidelines first, then companies will follow
 - 317 ○ pharma development is really risk-averse so need guidance from academia to move
318 forward, this goes equally for HTA
- 319 - A: Champions needed in the public and private sectors who understand the role and value of
320 PCTs. This highlights the need for upskilling
- 321 - A: Document and characterise options for limited PCT that only pragmatic to a certain
322 extent. Pharma R&D and decision makers should consider which pragmatic elements should
323 be incorporated in the PCT
- 324 - A: More space for PCT peri- and post launch or in conditional licencing
- 325 - V: need to have insight in the consequences of changing design options

326 HTA participants:

- 327 - V: PCTs for disease areas where PROs are more important, such as oncology
- 328 - V: PCTs for chronic diseases where you don’t have hard endpoints

- 329 - A: HTA needs a mind shift towards the idea that RCT and PCT are not two opposites but are
330 on continuum: analysing to what extent the designs they accept are already in some aspects
331 pragmatic might help in this aspect
- 332 - A: To what extent can PCTs, if applied right, mitigate the need for post authorisation safety
333 studies (PASS) or reduce their requirements?
- 334 - A: Possibility for PCT and RCT give different conclusions; need RCT to evaluate but
335 combination of PCT & RCT is more appropriate
- 336 - If you claim that PCT are different from RCT do we need a gold standard?

337 Academia participants:

- 338 - Current trial system is too restrictive, need to move to pragmatic/simple, also pre-launch
- 339 - V: A lot of decisions in health care are currently not evidence-based, therefore there is a
340 need for more trials in general
- 341 - There may be a role for more adaptive trials where the move is from closely monitored RCT
342 to more PCT during the drug development process
- 343 - V: methodological guidelines are required
- 344 - V: need framework to determine where you expect difference between usual practice and
345 RCT setting, because this determines where you need more pragmatism in your trial, for
346 instance adherence, dosing in real practice. PRECIS is first step but not complete, need to
347 make the link to whether you expect them to influence the outcome/drug effect

348

349 Group 2

350 The group formulated headline messages to pharmaceutical R&D who are considering PCTs:

351 *The patient message:* Bring patients into design discussions; ensure there is a clear benefit offered to
352 patients and ensure all subsequent data are fully disclosed. This will facilitate buy-in from patients.

353 *The regulator message:* Ensure the resulting data will be reliable for regulatory purpose and consider
354 the needs of HTAs. Understand what will make the study design and resulting data acceptable so
355 that you don't get to the end before realising design could have been optimised

356 *The HTA message:* Ensure the PCT brings value beyond RCTs and focus on the rationale why a PCT
357 might be required.

358 The group discussed a variety of ways in which acceptability of PCTs might be increased:

- 359 • A more standardised approach to design (Payer/HTA)
- 360 ○ Potential to increase acceptability by HTA/payers if there was more standardisation
361 of PRO, outcome measures and design features
- 362 ○ Avoid over-emphasis on outcome bias. A reality, but can be managed; dependent on
363 setting.
- 364 ○ There are no menus available – no current best practice
- 365 • Create a dialogue to explore options (Payer/HTA/Pharma/Pat)
- 366 ○ Use of joint scientific advice / multi-stakeholder discussions
- 367 ○ “Safe harbour” discussions
- 368 ○ Analyse – design study/run study and then analyse again, adjust design and so forth
- 369 • Increased generalisability of results

- 370 ○ For instance analytic techniques for modelling or extrapolating results
- 371 ○ Facilitating modelling of PCT results from one jurisdiction to another
- 372 ● More education is required
- 373 ○ Across all stakeholders
- 374 ● PCTs would not be used on their own
- 375 ○ Focus should be on situations where PCTs could complement traditional study
- 376 designs
- 377 ● Credibility would be increased if PCTs are used to show increased as well as decreased
- 378 effectiveness compared to RCT efficacy
- 379 ○ This will come with time, but can't be designed – no company develops a drug that
- 380 they believe will have limited effectiveness in the RW
- 381 ● Innovative hybrid/adaptive trial designs (Payer, Pharma)
- 382 ○ PCT to include a RCT population. Could you run a pre-specified interim analysis
- 383 which focuses on the RCT population using similar endpoints and run study for a
- 384 similar period of time – this would help provide internally validity of the trial. The
- 385 'RW' trial would then continue on for a longer period with the broader patient
- 386 population.
- 387 ● Build on potential patient-related strengths (Pat)
- 388 ○ Possible lower drop-out rates than RCTs if patients feel safe in clinical practice
- 389 ○ Added value by patient feedback based on real world.

390 Group 3

391 The group indicated that while scientific standards and best practice need to be outlined, they
 392 should at this stage be concerned with overarching principles, rather than specific details, and
 393 learning should be built upon case studies.

- 394 ○ Scientific standards and best practice
 - 395 ■ Overarching principles would be helpful (not too much detail), particularly if
 - 396 from an international convention including payers
 - 397 ■ There was some scepticism on the value of standards so early in the
 - 398 development of this field of research and concern that scientific progress should
 - 399 not be restricted to a narrow approach.
 - 400 ■ Current advice was felt to be based on historical PCTs rather than looking at
 - 401 what it is possible to achieve
 - 402 ■ Best approach is to learn through real examples
 - 403 ■ Consider a standard set of endpoints for PCTs and for a disease (with patient
 - 404 input)
- 405 ○ Scientific advice and review
 - 406 ■ Critical to build experience in PCT design and review via case studies so that the
 - 407 field can advance through learning by example
 - 408 ■ Review of whole development programmes, rather than individual studies, will
 - 409 allow R&D to consider what activities can be stopped or reduced if additional
 - 410 PCTs are planned. It will also allow consideration of the most efficient ways of
 - 411 addressing effectiveness challenges within the programme, either by increasing
 - 412 pragmatism of typical RCTs or including new PCTs
- 413 ○ Joint agreement on core questions
 - 414 ■ Joint scientific advice should be sought to ensure that key stakeholders
 - 415 (regulatory, payer, patient, Pharma (both R&D and commercial)) agree on a
 - 416 limited number of core questions so that the PCT can be robustly designed to
 - 417 answer these (rather than diluting rigour by adding multiple additional
 - 418 objectives)

- 419 ○ Need for an “authentic patient voice”
 420 ▪ Clear role for patients to input but consideration of the patient perspective
 421 should go beyond input into trial design and implementation. From early in
 422 development Pharma R&D should consider what patients want in a therapy area
 423 and how the development programme can address this.
 424 ▪ Embrace the variability of the patient perspective (for instance needs,
 425 experience, disease etc.)
 426 ○ Understanding of RWE and patient-centred outcomes
 427 ▪ To increase the ability to publish PCT protocols and results
 428 ▪ Increase publication reviewers’ and clinicians’ understanding
 429 ○ Simulations and building up of experience
 430 ▪ Increase observational data sources on the real world status quo and disease
 431 natural history in COPD (or relevant therapy area)
 432 • Collaboration of industry and academics
 433 • Include different healthcare systems and real world patient behaviour
 434 • These can then be used to simulate potential PCTs or generalise results
 435 from one locality to another

 436 ○ Consider how to design all trials to best answer the pertinent questions i.e. consider
 437 increasing pragmatism (for instance by including broader population) in typical Phase 3
 438 RCTs (it doesn’t necessarily require a separate PCT)
 439
 440 ○ Generalisability
 441 ▪ Some payers will not accept simulations to generalise results from a trial outside
 442 their healthcare setting (especially on healthcare system endpoints such as
 443 hospitalisations). The study must be conducted within the relevant healthcare
 444 system. Therefore, consider whether the effectiveness challenge can be
 445 answered by making multinational RCTs more pragmatic rather than conducting
 446 a single setting PCT.
 447 ○ Revision of the evidence hierarchy to reflect the continuum of pragmatism within
 448 studies

449 **“Patients’ views”**

450 A COPD patient emphasised that consistent input is required by patients throughout the
 451 development. The patient particularly encouraged trial designers and decision makers to involve
 452 patients as early as possible, especially on aspects related to drug delivery. The patient also
 453 highlighted aspects of conducting trials, which are sometimes overlooked, for instance how to
 454 communicate with patients and when to engage them.

455 The patient impressed on workshop participants that patients may have a range of emotions and
 456 feelings related to their condition and that required consideration of a more tailored approach,
 457 representing a spectrum of engagement. The patient encouraged all stakeholders to constantly
 458 consider the patients’ need, in particular that patients want better drugs, and an option to
 459 participate and provide a meaningful input into the development of new drugs.

460